UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE DUCTILE IRON PIPE FITTINGS IN RE DUCTILE IRON PIPE FITTINGS ("DIPF") INDIRECT PURCHASER ANTITRUST LITIGATION Civ. No. 12-169 (AET) (LHG)

STIPULATION AND PROPOSED ORDER

WHEREAS, plaintiffs in the Indirect Purchaser litigation ("Plaintiffs") and defendant SIGMA Corporation and its subsidiary SIGMA Piping Products Corporation (collectively "SIGMA") have made and entered into a settlement agreement ("Settlement Agreement") dated as of May 21, 2015; and,

WHEREAS, Plaintiffs are preparing and will promptly submit to the Court a motion ("Preliminary Approval Motion") for (a) certification of a class for settlement purposes; and (b) preliminary approval of the Settlement Agreement;

NOW, THEREFORE, this 22nd day of May, 2015, it is hereby STIPULATED AND AGREED, by and between Plaintiffs and SIGMA, that:

- 1. Until the Court's ruling on the Preliminary Approval Motion, all case deadlines applicable to SIGMA in the matter captioned <u>In re Ductile Iron Pipe Fittings Indirect Purchaser Antitrust Litigation</u>, docketed at No. 2:12-cv-0169-AET-LHG (the "Action"), including any deadlines that may yet be set, are stayed.
- 2. This stipulation shall not affect any case deadlines pertaining to parties other than SIGMA in the Action.

/s/ Lisa J. Rodriguez

Lisa J. Rodriguez

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Counsel for SIGMA Corporation and SIGMA Piping Products Corporation

SO ORDERED, this _____ day of May, 2015.

Lois H. Goodman United States Magistrate Judge